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PART II.

ANSWER

For answer to the specific allegations of the numbered parts and paragraphs of the Complaint, Defendant makes the following responses:

§1. DENIED as to lack of information and facts to support the allegations.

§2. ADMITTED that LAVENDER purports to be acting as Commissioner of the Tennessee Department of Financial Institutions but DENIED that his actions are authorized by his official capacity or that his official capacity empowers him to file such Complaint.

§3. DENIED as to identity of Receiver. Pursuant to notice filed in the Lewis County Chancery Court on May 18, 2004, LAVENDER appointed the entity "Jeanne Barnes Bryant/Receivership Management, Inc." as Receiver.

§4. ADMITTED.

§5. ADMITTED that Clifton Todd Bates resides at 312 Bastin Road, Hohenwald, Tennessee 38462 and that he is the son of Danny Bates.

§6. ADMITTED.

§7. ADMITTED.

§8. ADMITTED.

§9 - §20. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations.

§21. ADMITTED that Sentinel Trust Company was incorporated in

Tennessee under the Tennessee General Corporations Act in November, 1975. All other allegations are DENIED as to lack of information and facts to support the allegations.

§22. ADMITTED.

§23 - §38. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations.

§39. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations.. From personal observation, the residence is not carpeted.

§40 - §72. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations. Defendant was not a director during the time frame in reference and in fact resided in the State of Minnesota.

§73 - §107. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations.

§108. DENIED that Defendant served as a director during the time frames cited but ADMITTED that he is currently serving as director of Sentinel Trust Company.

§109. ADMITTED.

§110- §125. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations.

§126. ADMITTED.

§127 - §134. DENIED as to lack of information or facts to confirm or deny the truthfulness of the allegations.

WHEREFORE, PREMISES CONSIDERED, Defendant prays for relief as follows:

- (a) a dismissal of the Complaint against Defendant;
- (b) trial by jury of the allegations set forth herein, in the event this Complaint is not dismissed;
- (c) monetary judgments to be awarded to Defendant for attorney fees and other costs and expenses associated with this case; and,
- (d) all other relief as warranted by equity and justice.

Respectfully submitted,



GARY L. O'BRIEN, *PRO SE*

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have mailed copies of the foregoing Answer, by depositing said copies in the U.S. Mail, postage prepaid, this 20th day of July, 2005 to:

J. Graham Matherne
Wyatt, Tarrant and Combs, LLP
2525 West End Avenue, Suite 1500
Nashville, TN 37203-1423

Janet M. Kleinfelter
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Financial Division
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Gary L. O'Brien